

BALLARD SPAHR LLP

Daniel JT McKenna
Christopher N. Tomlin
210 Lake Drive East, Suite 200
Cherry Hill, NJ 08002
(856) 673-3840 (ph)
(856) 761-1020 (fax)
mckennad@ballardspahr.com
tomlinc@ballardspahr.com

Attorneys for Defendants-Creditors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:)	Case No. 14-14573 (TBA)
)	Chapter 13
GORDON ALLEN WASHINGTON,)	
)	
Debtor.)	
)	
GORDON ALLEN WASHINGTON,)	Adv. Proc. No. 14-01319 (TBA)
)	
Plaintiff-Debtor,)	
)	Hearing Date: _____, 2014 at _:_ .m.
vs.)	
)	
SPECIALIZED LOAN SERVICING LLC)	Judge: TBA
and THE BANK OF NEW YORK)	
MELLON, as TRUSTEE for the)	Oral Argument Requested
CERTIFICATE-HOLDERS of the)	
CWABS, INC., ASSET-BACKED)	
CERTIFICATES, SERIES 2007-5,)	
)	
Defendants-Creditors.)	

NOTICE OF EMERGENCY MOTION FOR STAY PENDING APPEAL

TO: Counsel of Record for Plaintiff-Debtor:

PLEASE TAKE NOTICE that on today's date, the undersigned, counsel for Specialized Loan Servicing LLC ("SLS") as special servicer for The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., ASSET-BACKED CERTIFICATES, SERIES 2007-5 s/h/a The Bank of New York Mellon, as Trustee for the certificate-holders of the CWABS, Inc., ASSETBACKED CERTIFICATES, SERIES 2007-5 (the "Trust," with SLS the "Defendants-Creditors"), filed an emergency motion (the "Stay Motion") pursuant to Rule 8005 of the Federal Rules of Bankruptcy Procedure for a stay pending appeal of this Court's November 17, 2014 Order [Adv. Doc. No. 30] granting the Debtor's Motion for Summary Judgment. Pursuant to a proposed Order Shortening Time, separately filed today, on _____, 2014, at __:_____.m., Defendants-Creditors shall move before a United States Bankruptcy Judge to be assigned, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, for an Order granting the Stay Motion.

PLEASE TAKE FURTHER NOTICE that in support of the Stay Motion, the undersigned shall rely upon the accompanying Brief. A proposed Order granting the relief requested in the Stay Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Stay Motion shall be filed and served in accordance with the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Stay Motion.

BALLARD SPAHR LLP

Dated: November 24, 2014

By: /s/ Christopher N. Tomlin
Christopher N. Tomlin
210 Lake Drive East, Suite 200
Cherry Hill, NJ 08002
(856) 673-3840 (ph)
(856) 761-1020 (fax)
tomlinc@ballardspahr.com

-and-

Daniel JT McKenna
1735 Market Street, 51st Floor
Philadelphia, PA 19103
(215) 864-8321 (ph)
(215) 864-8999 (fax)
mckennad@ballardspahr.com

Attorneys for Defendants- Creditors